


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
DISTRICT COURT
INDIANAPOLIS DIVISION
2018 SEP 12 PM 5:16

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 NOLAN BREWER,)
)
 Defendant.)

CAUSE NO.

1:18-cr-0286 TWP 
DLP

INDICTMENT

The Grand Jury charges that:

General Allegations

At times relevant to this Indictment:

1. The Congregation Shaarey Tefilla was a Jewish Synagogue located in Carmel, Indiana, which is in the Southern District of Indiana, with over 100 member households.
2. **NOLAN BREWER** was a resident of Morgan County, Indiana, which is also within the Southern District of Indiana. **NOLAN BREWER** is married to Person A, a minor, who lived with **NOLAN BREWER** in Morgan County, Indiana. Person A is not charged in this Indictment.
3. At various times, **NOLAN BREWER** discussed his beliefs in Nazism and white supremacy with other persons, including his co-workers and Person A. Among other things, **NOLAN BREWER** told co-workers about his admiration for Adolf Hitler and purported justifications for the Nazi's treatment of the Jewish people. He also attempted unsuccessfully to recruit a co-worker to his beliefs.

4. After committing the acts described herein, **NOLAN BREWER** bragged to co-workers about what he and Person A had done and showed co-workers digital photographs that had been taken of the scene, which depicted Nazi flags and Iron Crosses spray-painted, and a fire burning, on the property of the Congregation Shaarey Tefilla.

5. Additionally, after committing the acts described herein, **NOLAN BREWER** and Person A exchanged text messages expressing excitement at the news coverage resulting from the acts they committed.

6. On or about August 15, 2018, **NOLAN BREWER** was still in possession of supplies that he and Person A had obtained in preparation for the acts described herein, including red and black spray paint, Gatorade bottles with pieces of aluminum foil inside, Drano cleaner, nitrile gloves, ceramic pieces of spark plugs, and a bandana.

COUNT 1
Conspiracy to Violate Rights
18 U.S.C. § 241(a)

7. Beginning on or before July 27, 2018, and continuing thereafter until on or about August 15, 2018, in the Southern District of Indiana, and elsewhere, the Defendant

NOLAN BREWER,

knowingly and willfully conspired and agreed with Person A to injure, oppress, threaten, and intimidate the Rabbi and members of the Congregation Shaarey Tefilla, a Jewish Synagogue in Carmel, Indiana, in the free exercise and enjoyment of the right of all United States citizens to hold property free of racial discrimination under 42 U.S.C. § 1982, by painting anti-Semitic symbols, namely Nazi flags and Iron Crosses, on Synagogue property, and setting fire and attempting to set fire to Synagogue property.

Purpose of the Conspiracy

8. It was the purpose of the conspiracy to injure, oppress, threaten, and intimidate the Rabbi and members of the Congregation Shaarey Tefilla because they were Jewish.

Manners and Means of the Conspiracy

9. In furtherance of the unlawful purpose of the conspiracy, **NOLAN BREWER** and Person A used the following manners and means, among others:

10. On or about July 27, 2018, **NOLAN BREWER** and Person A traveled together to a Walmart store in Greencastle, Indiana and purchased supplies to carry out their conspiracy. They purchased, among other things, red and black spray paint, bandanas, Styrofoam plates, aluminum foil, eight Gatorade bottles, Drano cleaner, and disposable gloves.

11. On or about July 27, 2018, **NOLAN BREWER** and Person A purchased gasoline, which they intended to, and did, mix with pieces of the Styrofoam plates to create a viscous, flammable substance they called "napalm."

12. On or about July 27, 2018, **NOLAN BREWER** and Person A prepared overpressure explosive devices by tearing off strips of aluminum foil and placing them in all eight emptied Gatorade bottles, and screwing the caps back on the bottles, for their planned later use with the Drano cleaner to create an overpressure explosion.

13. On or before July 27, 2018, **NOLAN BREWER** and Person A obtained ceramic pieces of spark plugs, which they believed would assist in breaking glass windows.

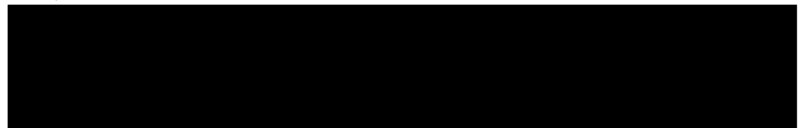
14. On or about July 27, 2018, **NOLAN BREWER** and Person A took screen shots of aerial photos of the area around Congregation Shaarey Tefilla, on which they made drawings indicating where they would park and the route they would take to get to the Synagogue.

15. On or about July 28, 2018, **NOLAN BREWER** and Person A drove to the Congregation Shaarey Tefilla with the spray paint, gasoline and Styrofoam mixture, overpressure explosive devices, and spark plug pieces, among other things.

16. On or about July 28, 2018, at approximately 2:30 A.M, on the sides of a walled enclosure on Synagogue property, **NOLAN BREWER** and Person A spray-painted two red and black Nazi flags, with Swastikas in the middle, along with two black Iron Crosses, measuring up to several feet in length and width. Additionally, they ignited the “napalm” in two locations on the ground near the enclosure, with one of the locations being next to the enclosure, which scorched one side of the enclosure wall. **NOLAN BREWER** and Person A were well aware that such acts carried anti-Semitic meaning, and they committed these acts in an effort to injure, oppress, threaten, and intimidate members of the Congregation Shaarey Tefilla because they were Jewish.

All of which is in violation of Title 18, United States Code, Section 241(a).


A TRUE BILL:



FOREPERSON

JOSH J. MINKLER
United States Attorney

By:



Nicholas J. Linder
Assistant United States Attorney